

IN THE UNITED STATES DISTRICT COURT
FOR SOUTHERN DISTRICT OF OHIO, WESTERN
DIVISION

FILED
JAMES BOHNI
CLERK
06 MAY 22 PM 1:23

William D. Reynolds, Col. USAF Ret.

Plaintiff,

vs.,

Windell Crawford, et. al.

Defendants

Case No. C-1-01-877, removed from
Common Pleas Court, Brown County,
Ohio Case No. 20010713 by counsel
John E. Vincent.

RESPONSE to DEPOSITION of Plaintiff on

FEB 6, 2006, in the captioned case.

Now comes the Plaintiff who states that he came into possession of said DEPOSITION, mailed FEB 18, '06 from London, Ohio whose Cover Letter is BACKDATED as FEB 22, 2006 and that Notary Denise L. Shoemaker in concert with Counsel John E. Vincent and unbeknown to Plaintiff ADDED STIPULATIONS that WAIVED the QUALIFICATIONS and or CHARACTER of NOTARY, Denise L. Shoemaker, received 2/27/2006, and NOT ACCEPTABLE, to Plaintiff.

1. During the course of said Deposition, continually lasting from 11:30AM to 2:30PM wherein Plaintiff was subjected to UNDUE DURESS, TRICKERY and BADGERING by counsel John E. Vincent, evidenced in said Transcript.

2. Notary, Denise L. Shoemaker submitted said Deposition Transcript to Plaintiff, received 2/27/2006. Transcript was less than 12 point standard printing measure (pica), therefore, Plaintiff was unable to read it without magnification that caused Undue strain on his eyes because he has INTEROCULAR LEN(s) and also wears Bi-Focal glasses.

3. The 2/27/2006 Deposition Transcript as described in #2 above contained Ms. Shoemaker's Unsigned CERTIFICATE, therefore, invalid.

(1.)

4. 4/28/2006, Plaintiff received, as described by Ms. Shoemaker a COURTESY COPY of Deposition Transcript wherein Ms. Shoemaker expects Plaintiff to make corrections for HER INABILITY to ACCURATELY do STENOTYPING of COMPLEX TEXT, [t]hus a VERIFICATION and DEMONSTRATION for HER LACK OF QUALIFICATION(s) as a STENOTYPIST and a NOTARY, demonstrated in said Transcript.

5. Nowhere in said Deposition Transcript consisting of 132 Typewritten Pages does Ms. Shoemaker and or counsel John E. Vincent REQUEST a CLARIFICATION for what Plaintiff's RESPONSES WERE. Further this Court has heard Plaintiff speak, and therefrom knows Plaintiff does not use the terms: YEAH, Uh-huh, Hu-uh, yet it is used extensively in Deposition Transcript, however, :

When we look at Page 8 line 10-15 reads Quoted, counsel Vincent:

Q. Let me go over the rules we're going to follow today. First of all, keep making all of your answers verbal, yes and no. If you say uh-huh or huh-uh, I'm going to ask you what you meant because it won't make it on the record.

A. Reasonable.

6. I ask this Court, counsel Vincent, and Ms. Denise L. Shoemaker is the Deposition Transcript intentionally written to BESMIRCH Plaintiff's ability to speak the english language wherein he uses such trivia to answer a question, and, why is it on the record?

7. Plaintiff REJECTS the content of Deposition Transcript, received on 4/28/2006 IN ITS ENTIRITY, and as defined herein.

8. If the Court overrules Plaintiff's REJECTION will mean that he is at liberty to submit additional documentation such as:

A. The neighbors accusing Plaintiff of shooting their dog, and the neighbors SON says it is not true, on tape recording.

B. The neighbors accusing Plaintiff of INDECENT EXPOSURE on 1/4/1997, and written up in the local paper (letter to the editor) where the Prosecutor refused to file charges or indict Plaintiff and further refused to Prosecute the neighbors for Making False Alarms ORC Section 2917.32 (A).

C. Where the Sheriff of Brown County, Ohio DOES NOT THINK LITTERING IS A CRIME.

D. Where the neighbor can Point a Gun at his brother and go BANG, as filed in Case No. 2005 1096 DRH then drop the charge, and the Prosecutor REFUSES to CHARGE or INDICT.


E. Where the neighbor files a Law-Suit against her DAUGHTER and her HUSBAND over PROPERTY SHE NEVER GAVE TO THE DAUGHTER.

F. Where, Plaintiff wholeheartedly believes the neighbor(s) are Stealing Water from BCRWA.

G. Where the neighbors have in the past and continue today to harbor vicious Dangerous Dogs, that often run at large.

H. Where the Dog Warden is permitted to run a local business instead of enforcing ORC Sections 955.01 to 955.99.

I. Where the Deputy Dog Warden(s) as of 5/18/1998 are using a Handbook by the HUMANE SOCIETY to enforce the Revised Code.


Col. William D. Reynolds, Plaintiff

CERTIFICATION

Two Original Signed copies mailed to Clerk with S.A.S.E. for return of file-stamp copy to Plaintiff. Copy mailed to counsel Vincent/Landes and a COURTESY copy mailed to Ms. SHOEMAKER. All mailings made on FRIDAY 5/19/06.